

### REMARKS

Claims 1-4 are pending. Reconsideration in view of the above amendments and following remarks is respectfully requested.

Claims 1 and 2 were rejected under 35 U.S.C. § 102(b) over Takahashi et al. (U.S. Patent 6,781,648) and claims 3 and 4 were rejected under 35 U.S.C. § 103(a) over Takahashi et al. in view of Schoniger et al. (U.S. Patent 5,027,258). The rejections are respectfully traversed.

Claim 1 recites a backlight device for lighting a liquid crystal display device. The backlight device includes self-luminous sources in primary colors of red, green, and blue. The three primary colors from the self-luminous sources are mixed and synthesized into white light. The backlight device include a light-conducting plate and/or a light-scattering plate. The self-luminous sources of the three primary colors are illuminated sequentially at different timings for each color and so that the self-luminous sources periodically illuminate in sequence by a switching operation. The light-generating timings for every two of the self-luminous sources partially overlap, which achieves time-division light-emission.

It is respectfully submitted that the Examiner has misunderstood and/or mischaracterized Applicant's arguments. The Examiner states on page 4, lines 5-7, of the Office Action, "Regarding the argument on page 4 that Takahashi et al does not simultaneously turning sources of the same primary colors on or off, this limitation is not cited in claim 1 of the instant application." (Italicized and underlining emphasis in original.)

Applicant clearly argued on page 4, lines 12-15, of the December 12, 2005 response that Takahashi et al. disclose in column 5, lines 9-12, that the first and second blue LED's B1 and B2 are switched on simultaneously or off simultaneously. Similarly, the first and second red LED's R1 and R2 are switched on/off simultaneously.

As discussed above, claim 1 clearly recites that the self-luminous sources of the three primary colors are illuminated sequentially at different timings for each color. As also discussed above, Takahashi et al. clearly disclose that their primary color (i.e. red and blue) LED's are switched on (i.e. illuminated) and switched off simultaneously. LED's that are switched on and off simultaneously cannot be illuminated sequentially at different timings for each color, as recited in claim 1. Accordingly, Takahashi et al. cannot anticipate claim 1.

With respect to the Examiner's citation to column 3, lines 7-49, of Takahashi et al., for its alleged disclosure of sequentially setting the light sources for a time division mode, it is respectfully noted that column 3, lines 11-16, of Takahashi et al. disclose that light beams

of the three primary colors are selectively emitted from the backlight and display patterns on the liquid-crystal shutter display panel are switched successively at a high speed to express the display patterns of R, G and B continuously in a time division mode to thereby make color display possible. (Underlining emphasis added.)

Claim 1 recites that the self-luminous sources in primary colors of red, green, and blue, wherein the three primary colors from the self-luminous sources being mixed and synthesized into white light, and the self-luminous sources of the three primary colors are illuminated sequentially at different timings for each color and so that the self-luminous sources periodically illuminate in sequence by a switching operation and the light-generating timings for every two of the self-luminous sources partially overlap, thereby achieving time-division light-emission. Claim 1 does not recite successively switching a shutter display of primary colors to achieve a color display, as disclosed by Takahashi et al. Therefore, Takahashi et al. do not anticipate claim 1.

With respect to the Examiner's arguments that Applicant has failed to show that the prior art fails to meet each and every limitation of the claims, it is respectfully submitted that Takahashi et al. do not disclose each and every feature of claim 1 for the reasons discussed above.

Moreover, with respect to Applicant's arguments in the last response, regardless of whether Takahashi et al., or the combination of Takahashi et al. and Schoniger et al., include all the claim limitations, the combination fails to present a *prima facie* case of obviousness as there is no suggestion or motivation to combine the references. As discussed in the previous response, Schoniger et al. fail to cure the deficiencies of Takahashi et al. discussed above with respect to claim 1 and even assuming it would have been obvious to combine the references, the combination would not disclose or suggest all the limitations of claim 1 and would fail to present a *prima facie* case of obviousness.

It is respectfully submitted that all of the claims are allowable and the entire application is in condition for allowance.

OTAKE -- 10/649,607

Attorney Docket: 041535-0305539

Should further issues require resolution prior to allowance, the Examiner is requested to telephone the undersigned at the number below.

Respectfully submitted,

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A handwritten signature in cursive script, appearing to read "John P. Darling", is written over the printed name.

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